

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

**TERPSEHORE MARAS,**

**Plaintiff,**

**v.**

**REPRESENTATIVE STEVE COHEN, US  
DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA and ALI  
ABDUL RAZAQ AKBAR A/KA/ ALI  
ALEXANDER,**

**Defendants.**

**Case. No. 1:21-cv-00317-DCLC-CHS**

**JUDGE CLIFTON L. CORKER**

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**DECLARATION OF MEGAN HEIM**

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STATE OF TENNESSEE )

COUNTY OF WILLIAMSON )

COMES NOW the Declarant, Megan Heim, pursuant 28 U.S.C. § 1746 makes the following declaration:

1. I am over 18 years of age.
2. I am competent to make the following representations.
3. I am a citizen of the State of Tennessee.
4. On Monday March 7, 2022, I donated five dollars (\$5) to Media Matters for America online.

5. At the time of my donation to Media Matters for America, I was physically present in Tennessee.

6. My receipt is attached hereto as Exhibit 1.

7. The receipt accurately records my donation to Media Matters for America.

FURTHER DECLARANT SAYETH NOT.

*Megan M Heim*

Megan M Heim (Mar 21, 2022 11:36 CDT)

Megan Heim

Mar 21, 2022

Date

**Subject:** Fwd: Thanks for donating

**Date:** Monday, March 21, 2022 at 10:54:11 Central Daylight Time

**From:** Erin Newman

**To:** Russell Newman

Sent from my iPhone

Begin forwarded message:

**From:** MH [REDACTED]  
**Date:** March 21, 2022 at 10:53:57 AM CDT  
**To:** Erin Newman <[REDACTED]>  
**Subject:** Fw: Thanks for donating  
**Reply-To:** MH <[REDACTED]>

----- Original Message -----

On Monday, March 7th, 2022 at 10:46 AM, Media Matters <action@mediamatters.org> wrote:

Dear Megan,

Thank you for your gift of \$5.00 to *Media Matters for America*.

Your donation directly supports our work for an honest and accountable media.

Have questions or comments? Email us at [action@mediamatters.org](mailto:action@mediamatters.org).

We couldn't do this without you!

The *Media Matters* Team

**Transaction Summary**

**Gift Information**

Date:	03/07/2022
Amount:	\$5.00
Tax Deductible Amount:	\$5.00
Confirmation Code:	62291

**Donor  
Information**

Donor Name: Megan Heim

Email Address: [REDACTED]

Address: [REDACTED]

Nolensville, TN  
37135  
US

**Payment  
Information**

Payment Type: American Express

Credit Card Number: [REDACTED]

Bank Account /  
Routing:

[mediamatters.org](https://mediamatters.org)

[Contact Us](#)

[Privacy Policy](#)